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Hon. Nelson S. Roman, USDJ
Federal Building & U.S. Courthouse
Southern District of New York
300 Quarropas St.
White Plains, NY 10601-4150

The application is granted. The
Initial Pre-trial Conf. is adjourned
from Jan. 31, 2020 until April 3, 2020
at 12:00 pm. Clerk of the Court
requested to terminate the motion (doc. 18).
SO ORDERED:

Dated: Jan. 30, 2020

HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE

Re: Liberty Insurance Corporation a/s/o Lilia Tse and Haoyang Li v. Whirlpool Corporation
Civil Action No.: 7:19-cv-01954-NSR

Dear Judge Roman:

This office represents Plaintiff in this matter. I write this letter with the consent of defense counsel Karen Ondrovic in anticipation of an initial court conference scheduled for January 31, 2020, at 11:50 AM in your chambers.

This is a fairly simple subrogated property damage case, where plaintiff alleges a stove purchased and then replaced through Home Depot was installed with improper clearance resulting in a fire and property damage to Liberty's insured.

Ms. Ondrovic's office answered on behalf of Whirlpool and is representing them based on a tender acceptance by Selective under Selective's policy with Reno's Appliance.

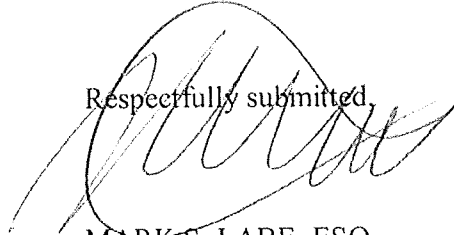
We just learned today from counsel that Reno's sub-contracted out the installation in question to Erik Monge d/b/a Inmovar Installations a/k/a J & G Installs, LLC. We were also told about potential insurance coverage for Erik Monge d/b/a Inmovar and the identity of an insurance agent.

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In light of the above, the parties jointly seek a 60 day adjournment of the January 31, 2020 initial court conference so the Complaint can be amended to bring Reno's Appliance and Erik Monge d/b/a Inmovar Installations a/k/a J & G Installs LLC, into the case. As mentioned, defense attorney Karen A. Ondrovic has provided consent to adjourn the conference and to amend the Complaint to add Reno's Appliance and Erik Monge d/b/a Inmovar Installations a/k/a J & G Installs, LLC, as defendants.

We will await further word from the court about the most expeditious manner to proceed forward.

Respectfully submitted,



MARK S. LABE, ESQ.

cc: Karen A. Ondrovic, Esq.